

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOSEPH S. GELMIS, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

EARL W. COLE, III, et al.,

Defendants.

CASE NO. 08-CV-00980 (RMB)

JULES ROTHAS, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

MUNICIPAL MORTGAGE & EQUITY,
LLC, et al.,

Defendants.

CASE NO. 08-CV-01120 (RMB)

ARNOLD J. ROSS, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

EARL W. COLE, III, et al.,

Defendants.

CASE NO. 08-CV-01299 (RMB)

ALEX D'ANGELO, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MUNICIPAL MORTGAGE & EQUITY,
LLC, et al.,

Defendants.

CASE NO. 08-CV-01331 (RMB)

JUDITH GREENBERG, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MICHAEL L. FALCONE, et al.,

Defendants.

CASE NO. 08-CV-02005 (MGC)

NAOMI RAPAHIEL, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MUNICIPAL MORTGAGE & EQUITY,
LLC, et al.,

Defendants.

CASE NO. 08-CV-02190 (RMB)

PLEASE TAKE NOTICE that the Kremser Group (or “Movant”) respectfully moves this Court for an order: (1) consolidating, pursuant to Fed. R. Civ. P. 42, all related actions; (2) appointing the Kremser Group as Lead Plaintiff in the consolidated action (the “Action”)

pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), and Section 27(a)(3)(B) of the Securities Act of 1933 (“Securities Act”), 15 U.S.C. § 77z-1(a)(3)(B) as amended by Section 101(a) of the Private Securities Litigation Reform Act of 1995 (“PLSRA”); and (3) approving its selection of the law firms of Kahn Gauthier Swick, LLC (“KGS”) and Brower Piven, A Professional Corporation (“BP”), as Co-Lead Counsel for the Class.

The Kremser Group makes this motion on the belief that it is the most “adequate plaintiff” as defined in the PSLRA because: (1) its members have the largest financial interest in the relief sought by the Class and have incurred substantial losses in the amount of \$924,138.87 as a result of their purchases of Municipal Mortgage & Equity, LLC stock during the Class Period; and (2) its members satisfy the typicality and adequacy requirements of Fed. R. Civ. P. Rule 23.

The Kremser Group further requests that the Court approve its selection of its counsel, KGS and BP, as Co-Lead Counsel for the Class. These firms have actively investigated the allegations raised against Defendants. KGS and BP are nationally-recognized law firms with significant experience prosecuting federal securities law class actions, and are firms with the resources to effectively and properly pursue this action.

For all of the reasons set forth herein and in the accompanying Memorandum of Law and the Declaration of David A.P. Brower in Support of the Motion of The Kremser Group to Consolidate All Related Actions, To Be Appointed Lead Plaintiff, and To Approve Proposed Lead Plaintiff’s Choice of Counsel submitted herewith, the Kremser Group respectfully requests that this Court: (1) consolidate all related actions with the instant case; (2) appoint the Kremser

Group as Lead Plaintiff pursuant to the PSLRA; (3) approve the Kremser Group's selection of Co-Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: March 31, 2008

Respectfully submitted,

BROWER PIVEN
A Professional Corporation

/s/ David A.P. Brower
David A.P. Brower
488 Madison Avenue
Eighth Floor
New York, New York 10022
Telephone: (212) 501-9000
Facsimile: (212) 501-0300

BROWER PIVEN, A Professional Corporation
Charles J. Piven
World Trade Center-Baltimore
401 East Pratt Street, Suite 2525
Baltimore, Maryland 21202
Telephone: (410) 332-0030
Facsimile: (410) 685-1300

-AND-

KAHN GAUTHIER SWICK, LLC
Kim E. Miller (KM-6996)
12 East 41st Street, 12th Floor
New York, NY 10017
Telephone: (212) 696-3730
Facsimile: (504) 455-1498

KAHN GAUTHIER SWICK, LLC
Lewis S. Kahn
650 Poydras St., Suite 2150
New Orleans, Louisiana 70130
Telephone: (504) 455-1400
Facsimile: (504) 455-1498

*Counsel for the Kremser Group and
Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that this Notice of Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on March 31, 2008.

/s/ David A.P. Brower
David A.P. Brower